

AARON D. FORD
Attorney General
DOUGLAS R. RANDS, Bar No. 3572
Senior Deputy Attorney General
State of Nevada
Public Safety Division
100 N. Carson Street
Carson City, Nevada 89701-4717
Tel: (775) 684-1150
E-mail: drands@ag.nv.gov

Attorneys for Defendants

*Kim Adamson, Romeo Aranas, Veronica Austin, Renee Baker,
Susan Baros, Fransisco Bautista, Dwayne Baze, Quentin Byrne,
David Carpenter, Tara Carpenter, Ian Carr, Anthony Carrasco,
Nichole Cordova, James "Greg" Cox, Scott Davis, Russell Donnelly,
James Dzurenda, Arwen Feather, Gilberto Florio-Ramirez, Sheryl Foster,
Tom Garrett, Coralee Gorsline, Katherine Hegge, Desiree Hultenschmidt,
William Kablitz, Alan Lima, Dominick Martucci, E.K. McDaniel, Valaree Olivas,
William Sandie, Richard Snyder, James Stogner, Roger Terrance, Kim Thomas,
Joy Walsh, Harold Wickham and Catherine Yup*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JOSEPH M. ANDERSON,

Plaintiff,

v.

JAMES DZURENDA, et al.,

Defendants.

Case No. 3:18-cv-00426-MMD-CLB

**MOTION FOR EXTENSION OF TIME TO
FILE RESPONSES TO PLAINTIFFS
MOTIONS TO COMPEL DISCOVERY, (ECF
NOS. 123, 124 AND 125)**

Defendants, Kim Adamson, Romeo Aranas, Veronica Austin, Renee Baker, Susan Baros, Francisco Bautista, Dwayne Baze, Quentin Byrne, David Carpenter, Tara Carpenter, Ian Carr, Anthony Carrasco, Jeffrey Chandler, Nichole Cordova, James "Greg" Cox, Scott Davis, Russell Donnelly, James Dzurenda, Arwen Feather, Gilberto Florio-Ramirez, Sheryl Foster, Tim Garrett, Coralee Gorsline, Katherine Hegge, Desiree Hultenschmidt, William Kablitz, Alan Lima, Dominick Martucci, E. K. McDaniel, Valaree Olivas, William Sandie, Richard Snyder, James Stogner, Roger Terance, Kim Thomas, Joy Walsh, Harold Wickham and Catherine Yup, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, Defendants David Carpenter, Pamela Feil, and Jason O'Dea, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General,

1 hereby submit their Motion for Extension of Time to File Responses to Plaintiffs Motions to Compel
2 Discovery, (ECF Nos. 123, 124 and 125) (First Request). This Motion is based on Federal Rule of
3 Civil Procedure 6(b)(1)(A), the following Memorandum of Points and Authorities, and all papers and
4 pleadings on file in this action.

5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 **I. ARGUMENT**

7 Defendants respectfully request a forty-five (45) day extension of time from the current
8 deadline, (January 2, 2019) to respond to Plaintiff's Motions to Compel Discovery in this case. Defense
9 counsel submits that the Plaintiff's Motions to Compel Discovery are extensive and fact specific.
10 Plaintiff has moved for an order to compel additional and amended responses to multiple answers to
11 interrogatories (ECF No. 123), requests for production of documents, (ECF No. 124) and requests for
12 admissions. (ECF No. 125). The time to respond to these motions will be extensive.

13 In this matter, the Defendants have responded to over 12 sets of interrogatories, 9 sets of
14 requests for production of documents, and 11 sets of requests for admissions. Plaintiff's motions do
15 not comply, strictly, with LR 26-7(b), in that the full text of the discovery originally sought is not set
16 forth. Therefore, the responses will be more time consuming. Additionally, Counsel with the holidays
17 are coming up, which is further stretching the resources of this office.

18 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

19 When an act may or must be done within a specified time, the court may,
20 for good cause, extend the time: (A) with or without motion or notice if
21 the court acts, or if a request is made, before the original time or its
extension expires; or (B) on motion made after the time has expired if the
party failed to act because of excusable neglect.

22 Defendants' request is timely and will not hinder or prejudice Plaintiff's case, but will allow for a
23 thorough opportunity to respond to the discovery requests. The requested forty-five (45) day extension
24 of time should permit the defendants time to adequately research draft, and submit responses to the
25 motions to compel discovery in this case. Defendants assert that the requisite good cause is present to
26 warrant the requested extension of time. Therefore, the Defendants request additional time, up until
27 Thursday, **January 16, 2020**, to respond to the Motions.

28 ///

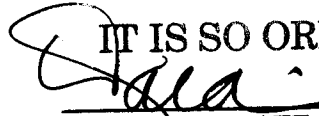
1 Plaintiff, in his motions also suggested a hearing relating to this issue. In light of the magnitude
2 of discovery in this case, the Defendants agree that a hearing may be appropriate.

3 DATED this 27th day of November, 2019.

4 AARON D. FORD
5 Attorney General

6 By: /s/ Douglas R. Rands
7 DOUGLAS R. RANDS, Bar No. 3572
8 Senior Deputy Attorney General

9 *Attorneys for Defendants*

10
11 IT IS SO ORDERED
12 
13 U.S. MAGISTRATE JUDGE
14 DATED: 12/3/2019
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that I am an employee of the Office of the Attorney General, State of Nevada, and that on this 27th day of November, 2019, I caused to be served a copy of the foregoing, **MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO PLAINTIFFS MOTIONS TO COMPEL DISCOVERY, (ECF NOS. 123, 124 AND 125)** , by U.S. District Court CM/ECF Electronic Filing to:

Joseph Anderson #62253
Care of LCC Law Librarian
Lovelock Correctional Center
1200 Prison Road
Lovelock, Nevada 89419
lcclawlibrary@doc.nv.gov

/s/ Laure Penny
An employee of the
Office of the Attorney General